

Martin A. Eliopoulos, Esq.
(admitted *pro hac vice*)
HIGGS FLETCHER & MACK LLP
401 West A Street, Suite 2600
San Diego, California 92101
Telephone: (619) 236-1551 - and -
Facsimile: (619) 696-1410
Email: elio@higgslaw.com

Michael J. Catalfimo, Esq.
John R. Canney, IV, Esq.
**CARTER CONBOY CASEBLACKMORE
MALONEY & LAIRD, P.C.**
20 Corporate Woods Blvd., Suite 500
Albany, New York 12211
Telephone: (518) 465-3484
Facsimile (518) 465-1843
Email: mcatalfimo@carterconboy.com

Counsel for BH North American Corporation

*Local Counsel for BH North American
Corporation*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

)	
In re:)	Case No. 18-23538 (RDD)
)	Chapter 11
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,)	
)	
Debtors. ¹)	(Jointly Administered)
)	
)	

**NOTICE OF APPEARANCE AND RESQUEST FOR NOTICES AND SERVICE OF
PAPERS BY BH NORTH AMERICAN CORPORATION**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

PLEASE TAKE NOTICE that BH North American Corporation (“BH”), by and through its undersigned counsel, hereby appears in the above titled action pursuant to 11 U.S.C. §§ 102(1), 342(a) and 1109(b), and Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and that the undersigned have been retained as attorneys for BH for the purpose of appearing in this action for any and all matters in which BH has an interest.

PLEASE TAKE FURTHER NOTICE that request is hereby made that copies of all notices (including those required by Bankruptcy Rule 2002), papers, reports, pleadings, motions, applications or petitions, schedules, plans, disclosure statements, and answering or reply papers filed in these cases or any related adversary proceeding be given and served upon the undersigned at the offices, postal addresses, telephone numbers and electronic mail addresses set forth below:

Martin A. Eliopoulos, Esq.
HIGGS FLETCHER & MACK LLP
401 West A Street, Suite 2600
San Diego, California 92101
Telephone: (619) 236-1551
Facsimile: (619) 696-1410
Email: elio@higgslaw.com

Michael J. Catalfimo, Esq.
John R. Canney, IV, Esq.
**CARTER CONBOY CASE
BLACKMORE
MALONEY & LAIRD, P.C.**
20 Corporate Woods Blvd., Suite 500
Albany, New York 12211
Telephone: (518) 465-3484
Facsimile: (518) 465-1843
Email: mcatalfimo@carterconboy.com
Email: jcanney@carterconboy.com

PLEASE TAKE FURTHER NOTICE that BH does not intend this Notice of Appearance and Request for Notices and Service of Papers, nor any subsequent appearance, pleading, claim, or suit, to waive any rights to which it may be entitled, including, but not limited to: (i) its right to have final orders in noncore matters entered only after *de novo* review by a District Judge; (ii) its right to trial by jury in any proceeding related to these cases; (iii) its right to have the District Court withdraw the reference of any matter subject to mandatory or discretionary withdrawal; or (iv) any rights, claims, actions, defenses, setoffs or recoupments to which it may be entitled under

agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments it expressly reserves.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Notices and Service of Papers does not constitute an agreement to accept service of initial process under Rule 4, F.R. Civ. P. or Rule 7004 F.R. Bank. P., nor shall it result in undersigned counsel being deemed to be the agent of BH for such purpose.

Dated: October 25, 2018

Yours, etc.

HIGGS FLETCHER & MACK LLP

Martin A. Eliopulos, Esq.
(admitted *pro hac vice* by Order dated October 24, 2018 and entered at Docket No. 277)
401 West A Street, Suite 2600
San Diego, California 92101
Telephone: (619) 236-1551
Facsimile: (619) 696-1410
Email: elio@higgslaw.com

Counsel for BH North American Corporation

**CARTER CONBOY CASE BLACKMORE
MALONEY & LAIRD, P.C.**

/s/ Michael J. Catalfimo
Michael J. Catalfimo, Esq.
John R. Canney, IV, Esq.
20 Corporate Woods Blvd., Suite 500
Albany, New York 12211
Telephone: (518) 465-3484
Facsimile: (518) 465-1843
Email: mcatalfimo@carterconboy.com
Email: jcanney@carterconboy.com

Local Counsel for BH North American Corporation